



U.S. Department of Justice

United States Attorney
Southern District of New York

MEMO ENDORSED

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

July 30, 2020

BY ECF AND E-MAIL

The Honorable Katherine Polk Failla
United States District Judge
Southern District of New York
New York, New York 10007

Re: *United States v. Robert Bell*, 16 Cr. 210 (KPF)

Dear Judge Failla:

A VOSR hearing is presently scheduled for August 14, 2020 at 10:00 a.m. in the above-captioned case. Yesterday, the Government learned that there has not been any progress in the defendant's case in Westchester County, which forms the basis of the instant VOSR specification, and that the Westchester matter has been adjourned indefinitely due to the COVID pandemic. Accordingly, the Government respectfully requests a 90-day adjournment of the defendant's VOSR hearing to track the progress of the defendant's state case. I have conferred with Daniel Hochheiser, counsel for the defendant, who consents to this request.

Respectfully submitted,

AUDREY STRAUSS
Acting United States Attorney

By: /s/ Rebecca T. Dell
Rebecca T. Dell
Jonathan E. Rebold
Assistant United States Attorney
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cc: Daniel Hochheiser, Esq. (via ECF)
Probation Officer Erica Cudina, U.S. Department of Probation (via e-mail)

Application GRANTED. Mr. Bell's VOSR hearing, previously scheduled for August 14, 2020, is hereby ADJOURNED to **October 30, 2020, at 2:00 p.m.** in Courtroom 618 of the Thurgood Marshall Courthouse, 40 Foley Square, New York, NY.

SO ORDERED.

Dated: July 30, 2020
New York, New York

HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE